

DEPARTMENT OF SOCIAL SERVICES
744 P Street, Sacramento, CA 95814



July 19, 1988

ALL-COUNTY LETTER NO. 88-83

To: ALL COUNTY WELFARE DIRECTORS
ALL FOOD STAMP COORDINATORS

SUBJECT:: FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PLANNING
GUIDELINES

REFERENCE: MPP 63-407
ALL-COUNTY LETTER 87-67

The purpose of this letter is to provide Counties with Food Stamp Employment and Training (FSET) Program Planning Guidelines for Federal Fiscal Year (FFY) 1989 (October 1, 1988 - September 30, 1989). It will be necessary for each County to develop and submit a plan of operation for the program by August 8, 1988. The County plans will be compiled into a State Plan that must be approved by the Food and Nutrition Service (FNS). Attached are the FSET Planning Guidelines (Attachment I) which contain detailed descriptions of the FSET program requirements and plan formats. We regret the extremely tight timeframe for completion of the plans and appreciate your cooperation.

Funding for the FSET Program

The FNS provides a 100 percent Federal allocation for the administrative cost of the program. This year, California's Federal allocation is \$5,109,135.

If a County wants to provide services at a level exceeding its 100 percent allocation, additional funding is available at the 50 percent Federal Financial Participation (FFP) level. This will allow Counties to offer additional services with the additional costs being shared at the normal 50 percent Federal/25 percent State/25 percent County ratio. Counties may request approval from SDSS to operate a program which has costs in excess of the 100 percent Federal allocation. To the extent that proposed services are consistent with Federal requirements, requests will be forwarded to FNS for approval as part of the State Plan.

Attachment II contains County allocations for the period of October 1, 1988 through September 30, 1989. Each County's allocation represents a proportionate share of the 100 percent Federal allocation, based upon the percentage of nonassistance Food Stamp recipients in each County compared to the statewide total. Alternative allocation methodologies were considered, but due to the newness of the program and problems with statistical reporting, we believe this is the most equitable approach. In the event that some Counties become geographically exempt, their allocations will be redistributed to Counties that are operating the program. Please note that expenditures for EDP maintenance and operation are to be charged against each County's program allocation.

Federal Performance Standards

The FNS will impose performance standards in the new FFY beginning October 1, 1988. The Secretary of Agriculture has established performance standards for States based on a percentage of registrants who are expected to participate who (1) actually do participate or (2) are sanctioned for nonparticipation. The standard to be imposed for FFY 1989 is 35 percent.

Fiscal sanctions may be imposed by FNS to the degree that the performance standard is not met. Along with the flexibility to design their FSET Programs, Counties also have the responsibility to meet the performance standards.

Federal determination of whether or not a State has met the performance standard will be largely based on the required quarterly statistical reports. These reports include data on the number of work registrants, notice of adverse action, reasons for deferrals, and placement of individuals in components. County reporting was seriously deficient in the first year of program operation. FNS has informed the Department that sanctions may occur if the accuracy and completeness of reporting does not improve.


County Plan Submittal

Please follow the County Plan format in Attachment I when preparing your plan. Counties desiring total geographical exclusion need only complete part V of the County Plan.

Please send your FSET plan and/or request for geographical exclusion by August 8, 1988 to:

GAIN and Employment Services Policy Bureau
744 P Street, M.S. 6-138
Sacramento, CA 95814.

If you have any questions, please have your staff contact your GAIN and Employment Services Operations analyst at (916) 445-0287.


DENNIS J. BOYLE
Deputy Director

Attachments

cc: CWDA

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ATTACHMENT I

FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PLANNING GUIDELINES

- A. Definitions
- B. Program Requirements
- C. County Plan Format Outline
- D. County Plan Format

A. DEFINITIONS

Alternate program delivery: The delivery of Food Stamp (FS) Employment and Training (FSET) Services through existing programs such as General Assistance (GA), Refugee Services, or Greater Avenues for Independence (GAIN).

Base of eligibles: FSET mandatory participants (defined below) plus persons who volunteer for FSET participation. This base may be reduced by 10 percent if participants served include individuals who leave the FS Program within 30 days of application.

Certified: An individual who is approved to receive food stamps.

Component: A job club/job search, work or training assignment designed to help food stamp participants to move promptly into unsubsidized employment.

Deferred registrant: A work registered individual whose circumstances prevent him/her from participating in FSET activities. Work registrants who are participating in programs that have standards exceeding those for FSET also may be deferred.

Employment and training grant: 100 percent Federal funding to cover the administrative and program costs involved in operating FSET. This does not cover participant reimbursement.

Employment and training program: A program operated by a County consisting of one or more FSET components.

Geographic exclusion: A County or part of a County that, due to compelling reasons, is approved by the Food and Nutrition Service (FNS) to be geographically excluded from operating FSET.

Individual deferral criteria: Criteria for deferring an individual for personal reasons, such as lack of child care, lack of transportation, mental problems, etc.

Mandatory participant: A work registrant who is not deferred from participation.

Matched funding: Funding at the 50 percent FFP level of program costs in excess of the 100 percent allocation. If the expenditures are approved, they will be reimbursed at the 50 percent Federal/25 percent State/25 percent County rate.

Participant reimbursement funding: The 50 percent Federal/25 percent State/25 percent County funding for the costs of participation, such as transportation and child care.

Placement: A "placement" occurs when a work registrant commences a component or is sent a Notice of Adverse Action (NOAA) for noncompliance or is denied certification due to noncompliance with an FSET Program requirement. Persons who fail to comply with other work registrant requirements or who voluntarily quit a job and are sent an NOAA may not be considered "placed".

Substitute program: A program that has participation requirements which exceed those contained in the FSET Program.

Work registrant: An individual who is required to register for work pursuant to Manual of Policies and Procedures (MPP) Section 63-407.1.

B. PROGRAM REQUIREMENTS

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COMPONENTS

Following is a description of the categories of components and allowable participation requirements. The number of months and number of successive components in which participation is required may be determined by the County as long as the minimum and maximum participation requirements of the program are met.

Requirements may vary among participants. The maximum hours of participation imposed on each individual must not exceed 120 hours per month, including nonwork and work component hours, Food Stamp Workfare Program hours, and hours worked for compensation, in cash or in kind. Both applicants and recipients of food stamps may be required to participate in the various components.

JOB CLUB/JOB SEARCH:

- o Job club (job search workshop) consists of group training sessions in job finding skills, job interviewing skills, understanding employer requirements and expectations, and in enhancing self-esteem, self-image, and confidence.
- o Supervised job search consists of an organized method of seeking work and may include access to phone banks, job orders, and direct referrals to employers.
- o Unsupervised job search consists of independent efforts by a registrant to look for employment and follow-up interviews by professional staff to determine the adequacy of the job search.

Participation requirements:

The minimum participation requirement in job club/job search components is 12 hours a month for two months or an equivalent effort. Participation requirements cannot be imposed if they would delay the determination of eligibility for or issuance of benefits to any household otherwise eligible. In job search, the participation requirement may begin at application for an initial period of up to eight consecutive weeks and continue for an additional period of up to eight weeks during 12 consecutive months. The 12-consecutive-month period may begin at any time following the close of the initial eight-consecutive-week period imposed on an applicant.

WORK COMPONENTS:

- o Workfare consists of a nonsalaried assignment with a public or private nonprofit agency that provides the registrant opportunity to develop basic work habits or to practice existing skills. Individuals assigned to workfare must be provided the same

benefits and working conditions provided to employees performing comparable work for comparable hours. In addition, a workfare assignment cannot result in the displacement of employed individuals or in the reduction of employment opportunities, such as substituting a workfare person in a vacant position.

- o On-the-Job Training (OJT)/Work Experience consists of an assignment to provide work experience or training or both to enable participants to move promptly into regular public or private employment. The assignment is limited to projects that serve a useful public purpose in fields such as health, social services, environmental protection, etc. The assignment cannot replace a regular employee but must provide the same benefits and working conditions that are provided to regular employees.

Participation requirements:

There are maximum participation limits for both households and individuals. Work component participation requirements imposed collectively on members of a household each month are limited to the number of hours equal to the household's allotment for that month divided by the higher of the applicable State or Federal minimum wage. The limits for individuals are specified above under COMPONENTS.

TRAINING:

Vocational training is a project, program, or experiment, such as a supported work program or a Job Training Partnership Act (JTPA) or State or local program aimed at accomplishing the purpose of FSET.

There are no specific participation requirements, as long as the FSET minimum and maximum participation requirements are met.

ALTERNATE SERVICE DELIVERY METHODS:

Each County Welfare Department (CWD) has the flexibility to choose the type of FSET component(s) it will operate. The CWD may operate the program or contract with another organization to operate the program.

Counties that operate their own programs may establish independent FSET components and/or use existing components of other work programs in GA, Refugee Services or GAIN. If existing components are used, the following conditions must be met:

- o Participation and sanction requirements are consistent with FSET.
- o The components are described in an approved County plan.
- o Activities associated with the delivery of services to FSET participants are time-studied and claimed to the FSET Program in accordance with applicable time study and claimant instructions issued by Fiscal Policy and Procedures Bureau (FPPB).

PARTICIPANT REIMBURSEMENT:

Participants must be reimbursed for transportation, child care, or other costs that are reasonably necessary and directly related to participation up to \$25 per month. Because this is a Federal mandate, Counties will be reimbursed for the participant reimbursement costs at the usual 50 percent Federal/25 percent State/25 percent County ratio. Counties have the option to pay in advance or in arrears; to use vouchers, checks, or cash; and to require participant verification of actual costs or to assume an average cost of up to \$25 per month.

PERFORMANCE STANDARDS:

Performance standards for States are set by the Secretary of Agriculture and have been specified as follows:

	<u>"Placements"</u>
- October - December 1988	35 Percent
- January - September 1989	35 Percent
- Federal Fiscal Year (FFY) 1989-90	50 Percent

The performance standard formula involves dividing the number of "placements" by the "base of eligibles". A "placement" occurs when a mandatory or volunteer individual begins an assignment or when a mandatory individual's FS eligibility is denied or terminated due to a failure to comply.

The "base of eligibles" includes all mandatory participants in the month of October added to each month's new mandatory participants and volunteers who are placed in a component. The mandatory participants include all FS work registrants who are not deferred from participation in the month of October plus each of the 11 subsequent months' newly work registered nondeferred individuals. Note that only those volunteers who begin a component are counted in the base of eligibles.

Following is the performance standard formula:

$$\frac{\text{Placements into Components} + \text{NOAAs for Noncompliance}}{\text{Mandatory Participants} + \text{Volunteers who enter a component}}$$

There are special rules for counting placements and computing the above formula when short-term individuals are not deferred from participation. (Short-term individuals include applicants as well as recipients who receive no more than one month's allotment.) In this case, the base of eligibles can be reduced by 10 percent without supporting documentation. If an actual count of persons who leave the program in 30 days or less is maintained, that number can be subtracted from the base, instead of the standard 10 percent.

Requiring participation at application, rather than at certification, results in an additional advantage. Applicants are not counted in the base until certified for FS benefits. In other words, only certified, work-registered,

nondeferred individuals are counted in the base. For example, if an applicant complies with an FSET assignment and is denied eligibility for reasons other than noncompliance with FSET or withdraws from the eligibility determination, that individual is not counted in the base.

The following example illustrates the effects of the above two provisions.

Ms. X. applies for Non-Assistance Food Stamps on October 2, 1987 and as an applicant she begins Job Search on October 3 (tally 1 for placement). On October 30, 1987, she becomes FS certified (tally 1 for the base). On November 5, she begins Job Club (tally 1 for placement). In November, she fails to participate in Job Search activities and is sent an NOAA for noncompliance (tally 1 for placement). When calculating the performance standard, 10 percent can be deducted from the base at the end of the year. Consequently, Ms. X would contribute the following to the performance standard:

$$\frac{3 \text{ Placements}}{1 - (1 \times .1)} = \frac{3}{.9} = 333\%$$

STATISTICAL REPORTING:

Federal regulations require that quarterly statistical reports be submitted 45 days after the close of the quarter. SDSS is requiring that Counties submit the FSET Statistical Report (STAT 40) within 15 days of the close of the quarter to allow time to compile the County reports and meet the Federal deadline.

C. OUTLINE OF FORMAT REQUIRED FOR FSET COUNTY PLAN

PART I : SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

- A. Component Summary.....
 - 1. Job Club/Job Search.....
 - a. Job Club.....
 - b. Supervised Job Search.....
 - c. Unsupervised Job Search.....
 - 2. Workfare.....
 - 3. Vocational Training.....
 - 4. Other Components.....
- B. Geographic Coverage.....

Part II : PROGRAM PARTICIPATION AND EXEMPTIONS

- A. Work Registrant Population.....
 - 1. Number of Work Registrants.....
 - 2. Number of Work Registrants to be Added Monthly.....
 - 3. Number of Work Registrants For The Year.....
- B. Deferral Criteria.....
 - 1. Individual Deferral Criteria and Justification.....
 - 2. Partial Geographic Exclusion Criteria and Justification.....
 - 3. Number of Deferred Registrants.....
 - a. Table 1.....
 - 4. Planned FSET Program Participants.....
 - a. Table 2.....
- C. Planned FSET Program Participants.....
 - 1. Table 3.....

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PART III: PROGRAM COORDINATION

- A. Intra-Agency Coordination.....
 - 1. Narrative Coordination Statement.....
 - a. Information Coordination.....
 - b. Coordination Timeframes.....
- B. Inter-Agency Coordination.....
 - 1. Areas of Coordination.....
 - 2. Coordinating Agencies or Programs.....
 - 3. Methods of Coordination.....
 - a. Table 4.....

PART IV : PROGRAM COSTS AND FINANCIAL MANAGEMENT

- A. Planned Costs of the County FSET Program.....
 - 1. Sources of FSET Funds.....
 - a. Table 5.....
 - 2. Component Costs.....
 - a. Table 6.....
 - 3. Justification of Costs.....
 - a. Justification of Cost Exceeding the FSET Grant.
 - b. Justification of Education Costs.....
 - 5. Contractual Arrangements.....
 - 6. Participant Reimbursement.....
 - 7. Cost Allocation.....

PART V : TOTAL COUNTY GEOGRAPHIC EXCLUSION

- A. Work Registrant Population.....
- B. Exclusion Justification.....

D. FOOD STAMP EMPLOYMENT AND TRAINING COUNTY PLANNING FORMAT

(Note: For Counties requesting total geographic exclusion, complete only Part V)

I. Summary of the County Food Stamp Employment and Training Program (FSET).

A detailed summary of the Program the County plans to operate shall be provided in Section A of the plan. Below are explanations of items which must be included in the component summaries required in Section I.A., as appropriate.

- o Description of component structure. Describe the participant activities of the component (see example).
- o Type of component. Each component must be designated as either a work or nonwork component. For purposes of the County Plan, a "Work Component" is defined as an actual job in the workplace. This is limited to workfare, On-the-Job Training, or work experience. Participation in a "work component" is limited in that the total hours of work required of members of a household cannot exceed the number of hours obtained by dividing the household's benefit level by the minimum wage. Any other type of component is defined as a "non-work component." Participants in "non-work" components under the FSET may be required to participate for up to 120 hours per month regardless of allotment size.
- o Geographic areas covered and variations among local areas. The areas where this particular component will operate should be summarized. A detailed map should be included in Section B, "Geographic Coverage."
- o Anticipated number of mandatory participants who will begin the component. Those participants who will be sanctioned if they fail to comply with the component requirements.
- o Anticipated number of volunteers who will begin the component. Food Stamp Program participants who volunteer for and begin a component, and who will not be sanctioned by the Food Stamp Program for noncompliance.
- o Anticipated number of Notice of Adverse Actions (NOAAs) to be sent to mandatory participants who fail to comply with FSET requirements. (This should not include persons sent a NOAA for voluntary quit or any other program noncompliance.)
- o Targeted population. Specify the criteria used to determine who is placed in this component (e.g., persons who have previously completed other components, non-English speaking, etc.) Indicate if applicants as well as participants are served.

- o Level of participant effort, or number of hours of participation in the component and duration. Component descriptions must specify level of effort for participants. FNS offers a level of effort comparable to 12 hours per month per participant for two months as a guideline for a meaningful component, but Counties can propose other meaningful participation levels.
- o Organizational responsibilities - service providers. Indicate which agency operates which parts of the FSET Program (e.g., CWD, Employment Services, contractors, etc.).
- o Cost of the component per participant, i.e., mandatory participants and volunteers who complete the component. This figure will not be derived from the number of placements in the component because it should not include the number of persons sent a NOAA. Eliminating NOAA's provides a more realistic estimate of cost per person. Do not include participant reimbursement.
- o Estimated amount of participant reimbursement to be paid to each participant who enters the component. Include Federal and State share, and consider the average length of the component.
- o Total cost of the component. Separate without participant reimbursement and including reimbursement. This cost should be the same as specified on Table 6, the Operating Budget.

A. Component Summary

The following sections outline the information which must be included for each specific component.

1. Job Club/Job Search

a. Job Club

- o Name of the component
- o Description of component structure (e.g., classroom training). Describe the duration and goals of the training as well as any specific job club requirements.
- o Geographic areas covered and local variations.
- o Anticipated number of mandatory participants who will enter component.
- o Anticipated number of NOAAs for failure to comply with the component.
- o Targeted population.
- o Level of participant effort.

- o Duration (e.g., one week, 30 hours per week of training).
- o Organizational responsibilities.
- o Per participant cost of participant reimbursement.
- o Cost of the component per participant.
- o Total cost of component including and excluding reimbursement.

EXAMPLE

- o Name of component: Job Club/Job Search
- o Description of component: This is a multifaceted intervention. Upon entry participants are given a one-hour individualized assessment and an individualized development plan is written. This is followed by two days (six hours each) of classroom instruction on job search techniques, including interviewing, telephone technique, preparation for interviewing and good work habits. The next five days are spent in a phone room arranging interviews with prospective employers. Participants must make five documented job contacts a day in the subsequent three weeks, reporting to a case manager every other week.
- o Geographic areas covered: Job club will operate in Montgomery, Hillsdale, Fairfax and Albertion. There is no local variation. The specified activities are provided in a standard fashion throughout the County.
- o Anticipated number of mandatory participants to begin component: 5,000.
- o Anticipated number of volunteers to enter component: 0.
- o Anticipated number of NOAAs for noncompliance with component: 200.
- o Targeted population: This is for persons who have participated in a job search component and have not located employment.
- o Level of participant effort: See above in description of component.
- o Duration: four weeks.

- o Organizational responsibilities: CWD contracts for provision of services.
 - o Per participant cost of the component: \$200.
 - o Per participant cost of participant reimbursement: \$25.
 - o Total cost of component \$1,000,000 excluding reimbursement, \$1,100,000 including reimbursement.
- b. Supervised Job Search
- o Name of the component.
 - o Description of component.
 - o Geographic areas covered and variations among local areas.
 - o Anticipated number of mandatory participants who will enter component.
 - o Anticipated number of volunteer participants who will enter component.
 - o Anticipated number of NOAAs to be sent for failure to comply with component.
 - o Number of job contacts that will be required over what time period.
 - o Targeted population.
 - o Organizational responsibilities.
 - o Method for monitoring job contacts (e.g. random phone calls).
 - o Per participant cost of participant reimbursement.
 - o Cost of the component per participant.
 - o Total cost of the component including and excluding reimbursement.
- c. Unsupervised Job Search
- o Name of the component.
 - o Description of component.

- o Geographic areas covered and variations among local areas.
- o Anticipated number of mandatory participants who will enter component.
- o Anticipated number of volunteer participants who will enter component.
- o Anticipated number of NOAAs to be sent for failure to comply with component.
- o Number of job contacts that will be required over what time period.
- o Targeted population.
- o Organizational responsibilities.
- o Method for monitoring job contacts (e.g., random phone calls).
- o Per participant cost of participant reimbursement.
- o Cost of component per participant.
- o Total cost of the component including and excluding reimbursement.

2. Workfare - Includes OJT and Work Experience

- o Name of the component.
- o Description of component.
- o Geographic areas covered and local variations.
- o Anticipated number of mandatory participants who will enter component.
- o Anticipated number of volunteers who will enter component.
- o Number of worksite positions expected.
- o Targeted population.
- o Duration.

- o Organizational responsibilities (e.g., CWD Employment Services develops worksites and assigns participants and monitors activity).
- o Per participant cost of participant reimbursement.
- o Cost of the component per participant.
- o Total cost of component including and excluding reimbursement.

3. Vocational Training

- o Name of the component.
- o Description of training program.
- o Geographic areas covered and local variations.
- o Anticipated number of mandatory participants who will enter the component.
- o Anticipated number of volunteers who will enter the component.
- o Anticipated number of NOAAs to be sent for failure to comply with component.
- o Level of effort.
- o Duration (e.g., one to three-month courses, two to four hours per day).
- o Targeted population.
- o Organizational responsibilities.
- o Per participant cost of participant reimbursement.
- o Cost per participant.
- o Total cost of the component including and excluding reimbursement.

4. Other Components

- o Name of the component.
- o Description of component.

- o Type of component.
- o Geographic areas covered and local variations.
- o Number of placements expected.
- o Level of participant effort.
- o Services.
- o Duration.
- o Mandatory or voluntary.
- o Organizational responsibilities.
- o Per participant cost of participant reimbursement.
- o Cost of the component per participant.
- o Total cost of the component.

B. Geographic coverage.

This section should include a map that specifies where in the County FSET components will operate during the year covered by the Plan of Operations. Specific cities/towns, local agencies, districts, Indian Reservations, or any other relevant operational designation should be noted. If different components will operate in different locales, those variations should be specified.

II. PROGRAM PARTICIPATION AND EXEMPTIONS

A. Work Registrant Population

The County plan must include the following work registrant data:

1. The number of work registrants expected to be in the County as of October 31, 1988;
2. The anticipated number of new work registrants to be added between November 1, 1988 and September 30, 1989; and
3. The total number of work registrants in the County between October 1, 1988 and September 30, 1989. (1. + 2. = 3)

This section should provide a clear explanation of the methods used to estimate the number of work registrants and the potential number of FSET participants (individuals, not placements). Actual figures from the current fiscal year should be used whenever possible as a basis for projecting counts for FFY 1989. In addition, this section should explain whether the estimated number of work registrants is based on a duplicated or unduplicated count of individuals - that is, whether the County is able to track individual work registrants who register more than once during a fiscal year and intends to count that individual as a work registrant only one time during the fiscal year, or whether individuals will be counted as new work registrants each time they register during a fiscal year.

One part of the planning process is a careful analysis of the characteristics of the work registrant population and the potential FSET caseload. This type of analysis is helpful in determining the scale of program that is anticipated, as well as for deciding what types of services/components to provide. In addition, these data could be used to justify deferral criteria. If such analysis has been done, a summary of the characteristics of the work registrant population should be included in this section of the Plan. The data should reflect the type of analysis used by the County to determine the composition of the FSET Program chosen by the County. For example:

- o Number of work registrants for the last year.
- o Demographic characteristics of work registrants (e.g., age, household status, gender, special groups such as Native Americans, migrant workers, refugees).

The summary should note how the data were compiled (e.g., special survey, FS Job Search Program data, analysis of the Quality Control file, agency automated client record or certification system).

B. Deferral Criteria

1. Individual Deferral Criteria and Justification

MPP Section 63-407.8 requires the County to screen each work registrant to determine whether or not he/she will participate or be deferred from the FSET Program. The criteria listed at MPP Section 63-407.811 is to be used to make deferral determinations.

This section of the County plan must include:

- Identification of County staff who will have authority to grant individual deferrals (e.g., eligibility worker, FSET staff, FSET supervisor, etc.).
- A description of the types of programs which will be utilized as substitutes for participation in FSET (MPP Section 63-407.23). Provide the estimated number of registrants deferred due to participation in such programs.
- A full explanation of the types of evidence that will be used to determine whether a deferral should be authorized.

2. Partial Geographic Exclusion Criteria and Justification

Part(s) of a County may be geographically excluded. FNS has suggested that factors which might justify a geographic exclusion include lack of job opportunities, the remote location of job opportunities, and lack of child care facilities. Other factors which might be considered by FNS include lack of public transportation in the area, recent plant closures causing high unemployment and areas declared disaster areas.

Lack of funds or conflict with GAIN are not acceptable reasons for requesting geographic exclusion.

Justification and documentation for the exclusion proposed must be included in this section of the Plan. FNS will require strong justification. This may include but is not limited to the following:

- o Public transportation availability (e.g., Public transportation is available on a fixed route only with limited operating hours, no inner-city transportation available).
- o Minimum round-trip travel time between unincorporated areas and the County Welfare Department.
- o Child care availability (slots available, slots needed).
- o Employment outlook.

3. Number of Work Registrants Deferred from the FSET Program

This section of the Plan must indicate what percentage of the County's total number of work registrants are expected to be included in the geographical exclusion and individual or substitute program deferrals planned. The format in Table 1 should be used.

Table 1

Estimated Participant Levels
October 1, 1988 - September 30, 1989

- | | | |
|----|-----------------------------------------------------------------------------------------|---------|
| A. | Total number of FS work registrants in County during the year | _____ |
| B. | Number of FS work registrants residing in areas geographically excluded from FSET | _____ |
| C. | Number of work registrants individually deferred from FS | _____ |
| D. | Total number of FS work registrants deferred due to participation in substitute program | _____ |
| E. | Percent of all FS work registrants deferred from FSET | _____ % |
| F. | Number of FSET mandatory participants* | _____ |

*Regulations define someone as a "mandatory participant" if the person is a work registrant who is not deferred under the County FSET Program. A mandatory participant is not necessarily actively participating in a County FSET component.

4. Planned FSET Program Participants

In this section of the Plan, Counties should provide a summary of the FSET caseload expected to be subject to the program (i.e., those work registrants not deferred, and those who do not live in geographically excluded areas) using the format presented in Table 2.

Table 2

Estimated FSET Participant Levels and Characteristics

Number of FSET Program Participants
October 1, 1988 - September 30, 1989

MANDATORY		VOLUNTARY		TOTAL
Applicant	Recipient	Applicant	Recipient	

C. Planned FSET Program Participants

Table 3 is to be used to provide a summary of the FSET caseload expected to be subject to the program - FSET mandatories and volunteers who will begin a component.

Table 3

Estimated FSET Placement* Levels
October 1, 1988 - September 30, 1989

1.	Number of mandatory participants expected to begin a component		_____
2.	Number of volunteer participants expected to begin a component	+	_____
3.	Number of NOAAs which will be sent for FSET noncompliance	+	_____
4.	Total number of placements the County expects to make during the year	=	=====

*Placements in an FSET component. If the County plans to place persons in more than one component during the planning year, each placement should be reflected here.

III. PROGRAM COORDINATION

Part 3 of the County Plan should describe two types of coordination: intra-agency (within the Food Stamp Program), and inter-agency (between the FSET Program and other agencies and programs).

A. Intra-agency Coordination

The Plan should clearly describe how the FSET Program relates to other processes in the Food Stamp Program.

1. Narrative Coordination Statement. The link between the following activities and the FSET Program should be described:

- o Intake, application, and recertification.
- o Work registration.
- o Screening for FSET participation requirement.
- o FSET registration.
- o Monitoring compliance with component requirements.
- o Determination of good cause.
- o Preparation of the Notice of Adverse Action.
- o Sanctioning resulting from noncompliance with the FSET Program.

This narrative statement could include a sample organization chart and sample client flow chart.

a. Information Coordination. This section of the plan should briefly describe how information will be coordinated and exchanged (forms, computer linkages, documentation of participant status and actions taken).

It is particularly important to describe the procedures established to assure that appropriate sanction actions are taken within ten working days after learning of an individual's noncompliance with FSET requirements.

b. Coordination time frames. Any planned time frames associated with the FSET Program and the major Food Stamp Program functions should be described (e.g., how much time elapses between application for food stamps and referral into the FSET Program; between initiating a Notice of Adverse Action and actual imposition of sanctions).

B. Inter-agency Coordination

An important aspect of the FSET Program is that it should coordinate as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients to improve their employability and self-sufficiency.

This section of the County Plan should describe any proposed linkages between the FSET Program and other programs (such as JTPA and the GA Work Program), using the format presented in Table 4, and summarized here:

1. Areas of Coordination

- o Another agency delivers services in a FSET component.
- o The FSET Program and another program or agency jointly operate one or more components (e.g., integrated GAIN/FSET Job Search Workshops).
- o The FSET Program refers individuals to another agency or program for services (e.g., referral to public adult education classes for remedial education).
- o Other areas of coordination should be specified as appropriate in the County.

2. Coordinating Agencies or Programs

- o JTPA.
- o GAIN.
- o General Assistance Work Program.
- o Other agencies or programs should be specified as appropriate in the County.

3. Methods of Coordination

- o Nonfinancial inter-agency agreements.
- o Contract for provision of services.
- o Joint Plans of Operations.
- o Coordinated local service delivery areas.
- o Informal referral procedures.
- o Other methods of coordination should be specified as appropriate in the County.

Table 4

Summary of
Inter-agency Coordination for the FSET Program
October 1, 1988 - September 30, 1989

<u>Areas of Coordination</u>	<u>Agencies</u> (list all that are involved)	<u>Number of FSET</u> <u>Participants Expected</u> <u>to be Served</u>	<u>Methods of Coordination</u> (write in the appropriate categories as listed on page 25)
------------------------------	----------------------------------------------------	------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------

1. Delivers a FSET Component

2. The FSET Program delivers a
a service for another
agency or program

3. Joint component of the
FSET Program and another
agency or program

4. Referral of individuals
from the FSET Program to
another program or agency

5. Other form of coordination
(Specify) _____

IV. PROGRAM COSTS AND FINANCIAL MANAGEMENT

Part IV of the County Plan must address the costs of the FSET Program and related financial issues.

A. Planned Costs of the County FSET Program

The information provided in the following subsections of the Plan must indicate how the Federal FSET funds are being used, and identify any use of State or County funds. If the CWD wants to provide services that cost more than the 100 percent Federal allocation, justification must be provided.

1. Sources of FSET Funds. This subsection shall estimate the total cost of the County FSET Program, and identify the source of funds, according to the funding categories. A format for providing this cost information is presented on Table 5.
2. Component Costs. This subsection shall include an estimate of the anticipated costs of each component included in the County FSET Program. A format is provided on Table 6.
3. Justification of Costs. Counties which plan to use Federal FSET funds for any education component or to request reimbursement for costs above the unmatched Federal grant must include a statement in subsection a. explaining why such charges are appropriate.
 - a. Justification of Costs Exceeding the FSET Grant. Counties requesting reimbursements in excess of the unmatched Federal Grant (other than for participant reimbursements) must explain the need for these funds (e.g., the breadth of services, the intensity of services, and the costs of the services). Costs in excess of the FSET grant can be allowed only with the prior approval of FNS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated.
 - b. Justification of Education Costs. Counties must explain the basis for any charges to the Federal Government for educational costs. This explanation should include a discussion of why such costs are attributable to the FSET Program and cannot be met through other existing education programs. Address whether the services being provided are available to persons other than FSET participants and if so, what is the cost for those persons.

Table 5

Planned Fiscal Year Costs of the County FSET Program
by Category of Funding

		<u>Estimate</u>	<u>Projected</u>
		October 1, 1987 - September 30, 1988	October 1, 1988 September 30, 1989
1.	FSET Grant Funds (100 percent Federal):	_____	_____
2.	Additional FSET Expen- ditures: (50% Federal/ 25% State/25% County) +	_____	+ _____
3.	Participant Expenses Reimbursed:		
	Up to \$25 per month 50% Federal/25% State/ 25% County) +	_____	+ _____
4.	Total FSET Program Costs: (1. + 2. + 3. = 4.) +	_____	+ _____
		=====	=====

For the FFY 1989 plan, include what anticipated claims will be for the period October 1, 1987 - September 30, 1988, based on actual expenditures as of the time of plan preparation.

5. Contractual Arrangements

If the County anticipates contracting out any portions of the FSET Program, this section of the County Plan should describe those contractual arrangements and briefly summarize the contract management approach that will be followed (e.g., performance contracting, method of contract monitoring, auditing procedures, competitive procurement). Please provide: 1) the name and location of the contractor, 2) the amount of the contract, 3) the contract management approach that will be followed (e.g. performance-based contract), 4) the basis for charging for contractual services, (i.e. will actual costs be claimed or a certain amount per activity?), and 5) the number of persons expected to be placed through the contract. FNS regulations require that copies of all contracts for FSET services be available for inspection at the County offices.

6. Participant Reimbursement

The County is responsible for reimbursing participants for expenses incurred in relation to FSET activities. Any information on how many individuals are expected to need reimbursement and the amount of money individuals may need should be included here.

Method of Reimbursement

Counties can choose between two methods for reimbursing participants: (1) reimburse actual expenses incurred, or (2) reimburse based on an average cost of expenses. This section of the Plan should indicate which of the two methods the County has chosen.

If the County wants to provide allowances to participants based on the average costs of participating in FSET, this section of the Plan must also include an explanation of the method that will be used to determine average expenditures, up to \$25 per participant per month.

Procedure for Reimbursement

Plans should also describe the procedures to be used for reimbursing participants. Counties may decide to provide up front allowances to participants or they may choose to reimburse them after the expenses have been incurred. If the participant must provide documentation of expenditures prior to reimbursement, this should also be discussed. If other agencies are given responsibility for providing reimbursements to participants, the Plan should explain how such costs will be reported so that the Federal payment of each participant is no more than \$12.50 per person per month and expenditures are properly reported.

7. Cost Allocation

If FSET is being administered in conjunction with other employment programs serving recipients of other forms of assistance the Plan shall address the basis for allocating costs.

V. TOTAL COUNTY GEOGRAPHIC EXCLUSION

This part of the plan should be completed by a County that believes its entire County requires a geographic exclusion.

In order to obtain FNS approval of excluding certain geographic areas, strong, specific justification regarding the impracticality of operating a program in that area must be provided by the County. For example:

- o "No public transportation and the private bus line is inadequate and costly. 90 percent of potential participants would need to travel over 80 miles to participate."
- o "Minimum round-trip travel time between unincorporated areas and the County is two hours."
- o "Shortage of available child care slots in each of the four major areas of the County" (specify what four areas). "100 slots available; need 460 slots total."
- o "Two thousand (2,000) employees have been affected in the past 12 months by closure of four major businesses."
- o "Economy still impacted by 1986 major flood (declared disaster area)."

A. Work Registrant Population

Please provide us with the number of excluded work registrants for the period beginning October 1, 1987 through June 30, 1988. A summary of the characteristics of the work registrant population should also be included if available. Such characteristics include:

- o Number of FSET work registrants for the last year.
- o Demographic characteristics of work registrants (e.g., age, household status, sex, special groups such as Native Americans, migrant workers, refugees).
- o Program status (PAFS versus NAFS; AFDC status; GA status).

The summary should note how the data was compiled (e.g., special survey, FS Job Search Program data, analysis of the Quality Control file, CWD automated client record or certification system).

B. Exclusion Justification

Provide a narrative statement(s) about why your County should be excluded.

FSET County Planning Allocations*
October 1, 1988 - September 30, 1989

County	Allocation	County	Allocation
Alameda	235,850	Orange	114,881
Alpine	505	Placer	21,353
Amador	3,631	Plumas	2,698
Butte	43,056	Riverside	101,468
Calaveras	7,873	Sacramento	196,872
Colusa	6,714	San Benito	10,344
Contra Costa	81,082	San Bernardino	164,785
Del Norte	11,614	San Diego	297,517
El Dorado	14,740	San Francisco	150,502
Fresno	273,861	Sasn Joaquin	144,582
Glenn	9,036	San Luis Obispo	19,775
Humboldt	34,775	San Mateo	28,845
Imperial	49,967	Santa Barbara	51,140
Inyo	4,213	Santa Clara	140,797
Kern	162,558	Santa Cruz	27,691
Kings	40,613	Shasta	47,654
Lake	19,313	Sierra	909
Lassen	5,035	Siskiyou	15,264
Los Angeles	1,557,708	Solano	23,185
Madera	32,837	Sonoma	42,628
Marin	17,823	Stanislaus	90,085
Mariposa	4,968	Sutter	19,915
Mendocino	24,084	Tehama	18,568
Merced	63,173	Trinity	4,626
Modoc	5,540	Tulare	136,190
Mono	952	Tuolumne	9,729
Monterey	58,061	Ventura	81,193
Napa	10,364	Yolo	26,013
Nevada	10,070	Yuba	29,908

*Minimum allocation if no geographic exclusions are approved.